

COLE SCHOTZ P.C.

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Attorneys for Educational Credit Management Corporation

Presentment Date: April 15, 2015, at 12:00 p.m.

Objection Deadline: April 14, 2015, at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

BERNADETTE ROBERTS,

Debtor.

CASE NO. 10-16314-REG

Chapter 7

BERNADETTE ROBERTS,

Plaintiff,

v.

USA FUNDS,

Defendant.

ADV. PRO. NO. 13-01461-REG

**NOTICE OF PRESENTMENT OF ORDER GRANTING STIPULATION AND
CONSENT ORDER (i) AUTHORIZING EDUCATIONAL CREDIT MANAGEMENT
CORPORATION TO INTERVENE AS A DEFENDANT, AND (ii) DISCHARGING
STUDENT LOANS**

PLEASE TAKE NOTICE that Educational Credit Management Corporation (“ECMC”),
is seeking entry of an Stipulation and Consent Order (i) Authorizing Educational Credit
Management Corporation to Intervene as a Defendant, and (ii) Discharging Student Loans (“the
“**Order**”), and will present the annexed proposed Order for signature to the Honorable James L.

Garrity, U.S.B.J., on April 15, 2015, at 12:00 noon (the “**Presentment Date**”), in the United States Bankruptcy Court, Southern District of New York, One Bowling Green, New York 10004 (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the proposed Order must: (a) be in writing; (b) state with particularity the grounds thereof; (c) be (i) filed with the Clerk of the Bankruptcy Court in accordance with the Standing General Order of the Bankruptcy Court for the Southern District of New York, entered on May 17, 2010, M-399, establishing procedures for electronic filing (see <http://www.nysb.uscourts.gov/>), and (ii) received in the Chambers of the Honorable James L. Garrity , U.S.B.J., United States Bankruptcy Court for the Southern District of New York, Courtroom 601, One Bowling Green, New York, NY 10004; and (d) be served upon counsel for ECMC, Cole Schotz P.C., 900 Third Avenue, New York, New York 10022, Attn: Kenneth L. Baum, Esq., so as to be received no later than **April 14, 2015, at 4:00 p.m.** (the “**Objection Date**”).

PLEASE TAKE FURTHER NOTICE that if no objection to the proposed Order has been timely and properly filed and served by the Objection Date, the Bankruptcy Court may sign the Order on the Presentment Date. If objections are timely filed and served, the Court may schedule a hearing on notice to the parties.

DATED: New York, New York
April 8, 2015

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By: /s/ *Kenneth L. Baum*

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